

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced)	
E911 Emergency Calling Systems)	
)	

To: The Commission

**Carrier Report of Advantage Cellular Systems, Inc. Regarding
Implementation of Wireless E911 Phase II Automatic Location Identification**

Advantage Cellular Systems, Inc. ("Advantage") hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI"), in compliance with the Federal Communications Commission's ("FCC" or "Commission") Further Memorandum Opinion and Order in the above-captioned proceeding.

I. Background / Contact Information

Advantage serves rural Tennessee and its contact information is as follows:

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Manager

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II. E911 Phase II Location Technology Information

Advantage has yet to choose a solution for its Phase II ALI technology. However, Advantage is leaning toward a handset solution. While Advantage remains undecided at this point due to its concern about general handset availability, it is leaning heavily toward handsets if a product becomes available and is proven to work within the time frame necessary for Advantage to achieve Phase II implementation in compliance with

the Commission's rules.¹ Whichever technology Advantage selects, it intends to deploy it throughout its service area.

III. Testing and Verification

Advantage has yet to test any ALI solutions since it is still examining available products. In addition, Advantage has not been able to test any handsets since none are available and Advantage has yet to be given a date when ALI-capable handsets will be available. Advantage anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the technology it eventually chooses.

IV. Implementation Details and Schedule

While Advantage is awaiting product availability from handset vendors, it has developed a tentative implementation schedule to meet the FCC's handset-based rules and, if necessary, network-based rules. Advantage will make its technology choice by the first quarter of 2001. If Advantage chooses a handset solution, it will begin selling ALI-capable handsets on October 1, 2001 as the FCC's rules require. Advantage will continue to evaluate network-based ALI solutions and, if it chooses a network solution, intends to select and deploy a technology after the first quarter of 2001, once it has made its choice. Advantage will accelerate this schedule to the extent necessary upon receipt of a PSAP request.

V. PSAP Interface

Advantage has yet to receive a Phase II PSAP request. Advantage has been working with the Tennessee E911 Board on Phase I implementation which is scheduled to be finished by the first quarter of 2001. Advantage is working with the Tennessee E911 Board on possible technological solutions for Phase II. At the moment, the details of the PSAP interface for Phase II remain dependent upon the choices that the Tennessee E911 Board makes.

VI. Handset Information

If Advantage decides to pursue a handset-based solution, it will run promotions in order to replace existing handsets. The price of the new ALI-capable handsets, unavailable at this time, will affect Advantage's replacement strategy.

¹ Advantage has been researching many different Phase II vendors and their potential product offerings. These companies include Snap Track, SCC Communications, Technocom Corporation, GTE Telecommunications Services, Cell-Loc, True Position, US Wireless, and SigmaOne Communications Corporation.

VII. Other Information

Advantage notes that the remote and rural nature of its service territory in Tennessee can present additional and unforeseen problems when installing and testing location technology. Advantage would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing. Unfortunately, Advantage's Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

November 9, 2000